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*Attorneys for Debtor, Rosa Maria Styles*

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

ROSA MARIA STYLES,

Debtor.

Chapter 11

Case No. 19-32881 (ABA)

Honorable Andrew B. Altenburg, Jr.

**CERTIFICATION OF STEVEN GALIFFA IN SUPPORT OF  
(I) DEBTOR'S OPPOSITION TO MOTION OF THOMAS J.  
WELSH, JR. TO ENFORCE THE TERMS OF THE  
CONFIRMED CHAPTER 11 PLAN PURSUANT TO 11 U.S.C.  
§§ 105(a) AND 1142, AND (II) DEBTOR'S MOTION TO (A)  
AUTHORIZE SALE OF DEBTOR'S REAL PROPERTY  
FREE AND CLEAR OF LIENS, CLAIMS AND  
ENCUMBRANCES PURSUANT TO 11 U.S.C. § 363 (b), (f),  
and (m); AND (B) GRANTING RELATED RELIEF**

Steven Galiffa, of full age, certifies as follows:

1. I am the managing member of SJS Holdings, LLC ("SJS"). SJS is the proposed buyer of real property owned by Rosa Maria Styles located at 43 West 12<sup>th</sup> Street, Avalon, New Jersey ("Property"), the Chapter 11 debtor ("Debtor") in the above referenced matter. Accordingly, I have personal knowledge of the facts set forth herein.

2. I submit this Certification in support of the (I) Debtor's opposition to Thomas J. Welsh, Jr.'s Motion to Enforce the Terms of the Confirmed Chapter 11 Plan Pursuant to 11 U.S.C. §§ 105(a) and 1142 (the "Motion"), and (II) Debtor's Motion (A) authorizing the sale of Debtor's

Property to SJS free and clear of liens, claims and encumbrances pursuant to 11 U.S.C. § 363 (b), (f), and (m); and (B) granting related relief (the “Sale Motion”).

3. I have entered into a sale contract with the Debtor to the Property for \$3,500,000.

It is an “all cash” transaction and no mortgage contingency. I am able to close on the sale of the Property by September 15, 2021.

4. In support of the Sale Motion, I have deposited \$2,000,000 into my attorney’s non-interest-bearing escrow account as a good faith deposit. See Exhibit A.

5. I respectfully request the Court deny the Motion and grant the Sale Motion.

I certify under penalty of perjury that the foregoing statements made by me are true and correct. If any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Steven Galiffa

STEVEN GALIFFA

Dated: August 6, 2021

# EXHIBIT A

**Sari B. Placona**

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**From:** Ernest Palmarella <edp@pkpc.net>  
**Sent:** Friday, August 6, 2021 12:57 PM  
**To:** Sari B. Placona  
**Subject:** Fwd: Signed

See attached. The money is in my escrow

Sent from my iPhone

Begin forwarded message:

**From:** Steven Galiffa <stevengaliffa@gmail.com>  
**Date:** August 6, 2021 at 12:07:09 PM EDT  
**To:** Ernest Palmarella <edp@pkpc.net>  
**Subject: Signed**